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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 FREDERICK SCOTT FISCHER,) Case No. 2:20-cv-00339-APG-DJA
 11 Plaintiff,)
 12 v.) **STIPULATION AND ORDER TO
13 FULL SPECTRUM LASER LLC,) EXTEND DISCOVERY**
 14 Defendant.)
 15 _____)

16 IT IS HEREBY STIPULATED AND AGREED, by and between the parties'
 17 counsel of record, that discovery deadlines in the Scheduling Order (ECF No. 32) be
 18 extended forty-five days (45) days to allow Plaintiff to take the deposition of
 19 Defendant's 30(b)(6) witness(es). The deposition was noticed and expected to be
 20 complete within the deadline; however, counsel for both parties have experienced
 21 health issues and it has become necessary to reschedule the 30(b)(6) deposition.
 22 Accordingly, the parties are also requesting the following deadlines also be modified:

23	Discovery Deadline	December 2, 2021
24	Dispositive Motion Deadline	January 3, 2022
25	Joint Pretrial Order	February 2, 2022; however, if
26	dispositive motions are filed, the Joint Pretrial Order will be due thirty (30) days	
27	after the Court enters its decision on any dispositive motion(s).	

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1 The parties provide the following information to the Court regarding the
2 proposed extension of the discovery deadline. The reason for the parties' inability to
3 comply with this deadline is Defendant's counsel's previously unforeseeable medical
4 leave.

5 ***Discovery Completed To Date***

6 The parties have exchanged disclosures and written discovery. The motion to
7 compel which was before the Court, has been mostly resolved, and the parties have
8 scheduled depositions.

9 ***Remaining Discovery To Be Completed***

10 The parties are in the process of rescheduling Defendant's 30(b)(6) deposition.

11 ***Reasons Discovery Could Not Be Completed Within The Existing Deadline***

12 The parties continue to make progress in this matter, but Defendant's primary
13 counsel, Brian Bradford was out on a medical leave of absence and has since moved on
14 to other employment, necessitating a change in lead counsel. Plaintiff's counsel and
15 Defendant's counsel have both experienced health issues and it has become necessary
16 to reschedule the deposition of Defendant's 30(b)(6) witness. This extension will allow
17 the parties to conduct depositions prior to the close of the proposed discovery period.

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1 This is the parties' seventh request for an extension of the discovery deadline
2 date and is not made to delay this matter. Based upon the foregoing, the parties believe
3 there is good cause for the requested extension.

4 Dated this 12th day of October 2021.

5 FISHER & PHILLIPS LLP

THE VERSTANDIG LAW FIRM, LLC

6 /s/ Lisa A. McClane, Esq.

/s/ Maurice VerStandig, Esq.

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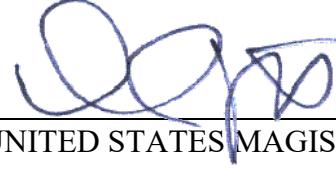
Maurice VerStandig, Esq.
1452 W. Horizon Ridge Pkwy, #665
Henderson, NV 89012
Attorney for Plaintiff

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12 IT IS SO ORDERED:

ORDER


UNITED STATES MAGISTRATE JUDGE

October 13, 2021

DATED

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